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**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,

Plaintiff,

v.

MICHAEL HASHEM SALMAN (001)

**SUZANNE LENISA RAMSEY SALMAN
(002),**

Defendant.

Case No:

71 SGJ 110

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES
AND ARTIFICES**, a Class 2 Felony, in
violation of A.R.S § 13-2310; (001) & (002);

COUNT 2: THEFT, a Class 2 Felony, in
violation of A.R.S 13-1802; (001) & (002);

COUNTS 3 and 5: FORGERY, Class 4
Felonies, in violation of A.R.S § 13-2002;
(002);

COUNTS 4, 6 and 7: FORGERY, Class 4
Felonies, in violation of A.R.S § 13-2002;
(001);

COUNT 8: PERJURY, a class 4 felony, in
violation of A.R.S § 13-2702; (001).

The Arizona State Grand Jury accuses, **MICHAEL HASHEM SALMAN (001)** and **SUZANNE LENISA RAMSEY SALMAN (002)**, charging on this 14th day of August, 2012, that in or from MARICOPA County, Arizona:

COUNT 1: FRAUDULENT SCHEMES AND ARTIFICES

Between March 10, 2008 and January 31, 2012, Defendants **MICHAEL HASHEM SALMAN (001)** and **SUZANNE LENISA RAMSEY SALMAN (002)**, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from the Arizona Health Care Cost Containment System (AHCCCS) by means of false or fraudulent pretenses, representations, promises or material omissions in violation of A.R.S. §§13-2310, 13-2301, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MICHAEL HASHEM SALMAN (001)** and **SUZANNE LENISA RAMSEY SALMAN (002)**, misrepresented their household income to the Arizona Department of Economic Security and received health insurance benefits, for themselves and their children, through AHCCCS for which they were not entitled.

COUNT 2: THEFT

Between March 10, 2008 and January 31, 2012, Defendants **MICHAEL HASHEM SALMAN (001)** and **SUZANNE LENISA RAMSEY SALMAN (002)**, without lawful authority, knowingly obtained services or property from the Arizona Health Care Cost Containment System (AHCCCS), in excess of twenty-five thousand dollars (\$25,000), by means of any material misrepresentation with intent to deprive AHCCCS of such property or services, in violation of A.R.S. §§ 13-1802(A)(3), 13-1801, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

Said conduct occurred when **MICHAEL HASHEM SALMAN (001)** and **SUZANNE LENISA RAMSEY SALMAN (002)**, were eligible for and obtained AHCCCS health insurance coverage for themselves and their children by means of material misrepresentations.

COUNT 3: FORGERY

On or about May 26, 2009, Defendant **SUZANNE LENISA RAMSEY SALMAN (002)** with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security a letter stating she was not employed, a forged instrument or one that contained false information, in violation of A.R.S. §§ 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

COUNT 4: FORGERY

On or about June 2, 2009, Defendant **MICHAEL HASHEM SALMAN (001)** with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security a statement regarding employment with Bureau of Merchant Services, a forged instrument or one that contained false information, in violation of A.R.S. §§ 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

COUNT 5: FORGERY

On or about May 29, 2010, Defendant **SUZANNE LENISA RAMSEY SALMAN (002)** with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security an Application for Health Insurance Benefits, a forged instrument or one that contained false information, in violation of A.R.S. §§ 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

COUNT 6: FORGERY

On or about May 30, 2011, Defendant **MICHAEL HASHEM SALMAN (001)** with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security an Application for Health Insurance Benefits, a forged instrument or one that contained false information, in violation of A.R.S. §§ 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

COUNT 7: FORGERY

On or about September 29, 2011, Defendant **MICHAEL HASHEM SALMAN (001)** with intent to defraud, offered or presented, whether accepted or not, to the Arizona Department of Economic Security a statement regarding "GIFTS LOANS and MONEYS", a forged instrument or one that contained false information, in violation of A.R.S. §§ 13-2002(A)(3), 13-2001, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

COUNT 8: PERJURY

On or about March 10, 2008, Defendant **MICHAEL HASHEM SALMAN (001)**, made a false sworn statement in regard to a material issue, believing it to be false in violation of ARS §§ 13-2702, 13-2701, 13-603, 13-701, 13-702, 13-703, 13-801 and 13-804.

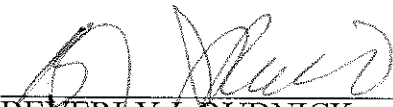
Said conduct occurred when **MICHAEL HASHEM SALMAN (001)** made false statements on an Arizona Department of Economic Security Medical Assistance Only Renewal Eligibility Determination Form when he failed to report and/or falsely reported household income.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in MARICOPA County, Arizona.

A "True Bill"
(A "True Bill")

THOMAS C. HORNE
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: 8-14-12



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Foreperson of the State Grand Jury